

hallak cleaners

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February 25, 1999

Secretary Federal Trade Commission Sixth and Pennsylvania Avenue NW Washington, DC 20580



Dear Secretary:

I am writing about the FTC's Garment Care Labeling Rule.

I respectfully request that you keep the comment period on this issue open beyond the current deadline of March 1st.

Present labeling regulations only require one appropriate care method to be provided on a care label. I find this "limited information" approach objectionable on two levels.

First, the consumer is being deprived of necessary and useful information. The perception can often be that there is no choice in care methods, when in fact other options exist.

Second, since one single care method may benefit one industry over another, the FTC is inadvertently endorsing/supporting the direction of consumer spending and preferences.

For instance, a consumer who reads a care a label that includes only home washing, may interpret that as the exclusive care method (when professional drycleaning may be just as acceptable a method). Consequently, that consumer is going to contribute to the revenue stream of a company such as Proctor and Gamble as opposed to the local neighborhood cleaner.

The IFI and NCA-I have jointly developed a position paper that goes into more detail on various facets of this issue.

The considerable knowledge which these organizations possess in fabricare technologies should be an integral part of the process leading to the ultimate form and character of Garment Care Labeling regulations.

Thank you for taking the time to hear my thoughts on the matter.

Sincerely, Unles Jeen

John-Claude Hallak

IH:dc

cc: William Seitz, NCA-I William Fisher, IFI

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